

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

IN RE: SEIZURE OF  
\$3,210.00 IN U.S. CURRENCY; and  
  
MISCELLANEOUS ITEMS OF  
JEWELRY AND ACCESSORIES.

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Misc. Case No.

1.17 MC

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JUDGE

JUDGE LIOI

STIPULATION TO EXTEND TIME  
FOR THE UNITED STATES TO  
FILE A JUDICIAL COMPLAINT IN  
FORFEITURE

The parties to the above-referenced matter, the United States of America and Claimant Basheera Perry (hereinafter collectively referred to as the "Parties"), each by undersigned counsel, or by authorized representative, agree as follows:

1. The above-captioned assets, (hereinafter referred to as "the Seized Currency, Jewelry and Accessories"), were seized by the United States Postal Inspection Service ("USPIS") on March 9, 2017, during the execution of a search warrant.
2. The USPIS initiated administrative forfeiture proceedings against the Seized Currency, Jewelry and Accessories. Claimant Basheera Perry filed a claim for the Seized Currency, Jewelry and Accessories on June 1, 2017. The USPIS did not receive any further claims contesting the administrative forfeiture of the Seized Currency, Jewelry and Accessories.
3. Under 18 U.S.C. § 983(a)(3)(A), the United States must file a judicial complaint in forfeiture against a seized asset not later than 90 days after a valid administrative claim for the seized asset is filed. However, 18 U.S.C. § 983(a)(3)(A) also provides that a court may extend the period for filing a complaint for good cause shown or upon agreement of the parties.
4. Pursuant to 18 U.S.C. § 983(a)(3)(A), and absent an extension of time, the deadline for the United States to file a judicial complaint in forfeiture with respect to the Seized Currency, Jewelry and Accessories is August 30, 2017.
5. Basheera Perry is represented by Jaye M. Schlachet, Esq., 55 Public Square, Suite 1600, Cleveland, Ohio 44113-1971. The Parties need additional time to discuss a possible resolution of the matter. Accordingly, the Parties wish to extend the time for the United States to file a judicial complaint in forfeiture against the Seized Currency, Jewelry and Accessories by 90 days, from August 30, 2017, to November 28, 2017.

STIPULATION TO EXTEND TIME FOR THE UNITED STATES TO FILE A JUDICIAL COMPLAINT IN FORFEITURE (Cont.)

6. The persons signing this Stipulation to Extend Time warrant and represent that they possess full authority to bind the persons or entities on whose behalf they are signing and that they are unaware of any other potential claimants to the Seized Currency, Jewelry and Accessories.

7. With respect to the Seized Currency, Jewelry, and Accessories, the Parties agree to an extension of the period for filing a judicial complaint in forfeiture to **November 28, 2017**.

/s/Jaye M. Schlachet (by phone consent)  
Jaye M. Schlachet, Esq.,  
55 Public Square  
Suite 1600  
Cleveland, Ohio 44113-1971

Executed this 24th day of August, 2017.

Attorney for Claimant Basheera Perry

/s/Phillip J. Tripi  
Phillip J. Tripi  
Reg. No. 0017767  
United States Court House  
801 West Superior Avenue, Suite 400  
Cleveland, OH 44113  
Phone: (216) 622-3769  
Fax: (216) 522-7499  
Phillip.Tripi@usdoj.gov

Executed this 24th day of August, 2017.

Attorney for the United States

IT IS SO ORDERED:

\_\_\_\_\_  
United States District Court Judge

\_\_\_\_\_  
Date